

75  
CERTIFIED MAIL  
Return Receipt Requested

JUL 25 1983

Mr. J. C. Patterson  
Section Manager  
Environmental Pollution Control  
McDonnell Douglas Corporation  
Department 191C, Building 102, L-3  
Box 516  
St. Louis, Missouri 63166

Dear Mr. Patterson:

The U.S. Environmental Protection Agency (EPA) Region VII Office is in the process of conducting a technical evaluation of your Resource Conservation and Recovery Act (RCRA) permit application. In conjunction with this evaluation, a review of the application and the supplemental information submitted January 17, 1983, to determine the completeness of your submission has been made. We have determined that the McDonnell Douglas Corporation (MDC) Tract I RCRA permit application is complete. Additional information to clarify, modify, or supplement previously submitted material is needed, however. Please respond to the following questions and/or comments within thirty (30) days of receipt of this letter.

General Facility Standards

1. Waste Analysis Plan - Wastes should be analyzed in accordance with procedures incorporated by reference in 40 CFR 260.11. For example, "Test Methods for Evaluating Solid Waste - Physical/Chemical Methods" (SW-846) should be utilized as the reference method in place of "Methods for Chemical Analysis of Water and Wastes." Are all test methods listed on Table C-2 (e.g., organics analyses)?

2. General Inspection Requirements - The inspection schedule description provided in your permit application does not provide sufficient information for us to adequately evaluate inspection procedures. Supplemental information is necessary. Please review 40 CFR 264.15, 264.174, and 264.194 and provide all necessary information. Inspection frequency of areas of inspection should be provided (e.g., six (6) - 750 gallon storage tanks: tank externally-daily, tank overflow control-daily, area around tank for evidence of leakage-weekly, emergency apparatus-monthly, internal inspection of tank-annually). The previous example is very brief in nature; you may wish to develop inspection lists on a daily, weekly, monthly, and annual basis and specify items evaluated at each location during an inspection. You must identify types of problems which are looked for in an inspection.

ARWM/WMBR-PMTS:SBusch:lmh:x6531:6-29-83:Disk B25

PMTS  
Busch

PMTS  
Harrington

WMBR  
Morbay



R00144185  
RCRA RECORDS CENTER

3. Preparedness and Prevention Requirements - Is all required equipment tested and maintained as necessary to assure its proper operation in time of emergency? Please describe. Is there access to a communication or an alarm system at each location where hazardous waste is stored? Please describe. Have arrangements been made to familiarize hospitals with properties of wastes handled? Please describe. Have any arrangements been made with other state or local authorities to aid in emergency situations? Please describe or explain refusals to enter into such arrangements.

4. Personnel Training - Please describe how the training program is designed to teach facility personnel who handle hazardous waste the proper procedure to effectively respond to an emergency. Will these personnel operate emergency equipment?

#### Tank Standards

1. Describe means to prevent overfilling of polytanks. If overfilling occurs, how will spillage be detected? Will operators of the "Industrial Waste Water Pretreatment Plant" be notified? Are tank levels checked prior to the addition of wastes? What will be the maximum inventory of waste stored in each of the polytank systems? When are the polytank systems emptied or what criteria is used? What is the ultimate disposition for these wastes (polytank systems)? What is the ultimate disposition of sludge generated in the "120,000 gallon in-ground tank?"

#### Container Standards

1. In your application on page F-4, concerning "Container Inspection," "height of container stacking" is mentioned. On page D-2 you state "full drums are never stacked." Are drums stacked?

2. Are the floors of storage areas sloped or pitched to drain leakage or other liquid to the sump area in order to prevent containers contact with standing of accumulated liquids? If no, explain how container contact with accumulated liquid is prevented.

3. Is liquid that has accumulated in the sump removed in a timely manner?

In responding to the previous questions and/or comments, it would be beneficial to incorporate your response into the text of your application in the form of a revision to the application. It would also be beneficial if your January 17, 1983, response was adjusted and managed in a similar manner. Again, please respond to our questions and/or comments within thirty (30) days of the receipt of their letter.



If you have any questions, please do not hesitate to contact me or the member of my staff most familiar with this subject, Stephen Busch, at (816) 374-6531.

Sincerely yours,

Lyndell L. Harrington, P.E.  
Chief, Permits Section  
Waste Management Branch  
Air and Waste Management Division

cc: Joe Jansen, MDNR

bcc: Robert Stewart, PMTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI 64101

cc: Steve Busch

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Sincerely yours,

*Lyndell L. Harrington*

Lyndell L. Harrington, P.E.  
Chief, Permits Section  
Waste Management Branch  
Air and Waste Management Division

cc: Joe Jansen, MDNR ✓

P 203 843 336

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

SENT TO Mr. J.C. Patterson  
Env. Pollution Control  
McDonnell Douglas Corp.  
Dept. 191C, Bldg. 102, L-3  
Box 516, St. Louis, Mo. 63166

POSTAGE \$ 6

CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		€
	SPECIAL DELIVERY		€
	RESTRICTED DELIVERY		€
	OPTIONAL SERVICES	SHOW TO WHOM AND DATE DELIVERED	€
		SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	€
		SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	€
		SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	€

TOTAL POSTAGE AND FEES \$

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3. ARTICLE ADDRESSED TO: Mr. J.C. Patterson  
Env. Pollution Control, McDonnell  
Douglas Corp., Dept. 191C, Building  
102, L-3, Box 516, St. Louis, Mo.

4. TYPE OF SERVICE: ARTICLE NUMBER 63166  
☐ REGISTERED ☐ INSURED  
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6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: 7a. EMPLOYEE'S INITIALS

Incorrect date Should be July 27, 1983  
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